

VOLCANO PARTNERS NEW JERSEY LLC

A Cement-Lock Company

November 14, 2012

Ms. Amy Legare
Chair, National Remedy Review Board
United States Environmental Protection Agency
One Potomac Yard (South Bldg.)
2777 S. Crystal Drive
Arlington, VA 22202
legare.amy@epa.gov

VIA OVERNIGHT AND ELECTRONIC MAIL

RE: COMMENTS RE LOWER PASSAIC RIVER RESTORATION PROJECT

Dear Chair Legare:

Please find below comments by Volcano Partners regarding the National Remedy Review Board's pending review of the proposed EPA Region 2 early action remedy for the Lower Passaic River Restoration Project (LPRRP).

Volcano Partners is the company charged to deploy the Cement-Lock® technology, the first sustainable thermo-chemical manufacturing process designed to manufacture a construction-grade, cementitious building material (Ecomelt®) from contaminated dredged sediment. The development of a commercial-scale Cement-Lock® facility would be the final step in the unprecedented 20-year effort by public and private stakeholders (WRDA Sediment Decontamination Program) to identify and deploy a sustainable, green technology capable of producing a beneficial use product from contaminated dredged sediments. As fully set forth in the attached memorandum, Cement-Lock® technology is ready for commercial-scale deployment as part of a local-regional sediment decontamination strategy.

On February 17, 2012, Volcano Partners submitted to EPA Region 2 the attached February 17, 2012 cover letter and November 30, 2012 memorandum from Tetra Tech in support of the pending Source Control Early Action and Focused Feasibility Study. In this memorandum, Tetra Tech outlines: 1) a proposed minimum (but scalable) Cement-

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Lock® facility to process 300,000 "in situ" tons of sediment, 2) an 18-month design, permit, and construction timeline for the facility and 3) an update to the process design by the Foster Wheeler Corporation.

Cement-Lock® technology is the only sustainable technology designed to provide virtually complete destruction of dioxins and PCBs (99.9999 percent DREs) contained in contaminated dredged sediments. Cement-Lock® technology delivers these high contaminant destruction rates, manufactures a "beneficial use" building product, and produces electricity from waste heat for a very competitive fee of \$350 per "in situ" ton of sediment. This fee would include landside material management, dewatering, sand removal and Cement-Lock® processing. This approach would be consistent with CERCLA Sec. 121, NCP regulations, and EPA guidance (EPA 540-R-93-057) that establish a preference for treatment over containment or land disposal.

We are available to provide any additional information regarding Cement-Lock® technology that you may require during your review. Do not hesitate to contact our team regarding any questions you, or the Board, may have regarding this important project.

Sincerely,

Al Hendricks Chairman / Managing Member (407) 492-9731

www.cement-lock.com

Robert E. Fabricant Counsel (908) 370-8063

cc: Hon. Judith Enck, Regional Administrator, USEPA Region 2
Hon. Colonel Paul E. Owen, District Commander, New York District, USACE
Hon. Bob Martin, Commissioner, NJDEP
Alice Yeh, USEPA Region 2

Attachments